

**APPENDIX A****SUMMARY OF ALLEGATIONS IN DIRECT ACTION PLAINTIFFS' COMPLAINTS**

<b>Text of allegation in Polaroid Complaint</b>	<b>Polaroid Compl. citation</b>	<b>Target Am. Compl. citation<sup>1</sup></b>	<b>P.C. Richard Compl. citation</b>	<b>Tweeter Compl. citation</b>	<b>CompuCom Compl. citation</b>	<b>Interbond Compl. citation</b>	<b>Costco Compl. citation</b>	<b>Circuit City Compl. citation</b>	<b>Office Depot Compl. citation</b>	<b>Electrograph Am. Compl. citation</b>
Plaintiffs indirectly purchased Cathode Ray Tube Products ("CRT Products") (as further defined below), in the United States from Defendants, their predecessors, any subsidiaries or affiliates thereof, or any of their unnamed co-conspirators, during the period beginning at least as early as March 1, 1995 until at least November 25, 2007 (the "Relevant Period"). Plaintiffs allege that during the Relevant Period the Defendants conspired to fix, raise, maintain and/or stabilize prices of CRT Products sold in the United States. Because of Defendants' unlawful conduct, Plaintiffs paid artificially inflated prices for CRT Products and have suffered antitrust injury to their business or property. <sup>2</sup>	1	1, 9	1, 9	1, 9	1, 9	1, 9	1, 10	1, 11	1, 9	1, 9

<sup>1</sup> The Target amended complaint does not use the defined term "CRT Products," and instead uses the term "CRTs" in the places where the Polaroid complaint uses the term "CRT Products."

<sup>2</sup> The analogous paragraphs in the Target, P.C. Richard, Tweeter, CompuCom, Interbond, Costco, Circuit City, and Office Depot complaints refer to a conspiracy to stabilize the price of "CRTs" rather than "CRT Products."

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This global conspiracy is being investigated by the Antitrust Division of the United States Department of Justice ("DOJ"), and by several other international competition authorities. On February 10, 2009, a federal grand jury in San Francisco issued a two-count indictment against C. Y. Lin, the former Chairman and CEO of Defendant Chunghwa Picture Tubes, Ltd., for his participation in a global conspiracy to fix the prices of CRTs used in computer monitors and televisions. On March 18, 2011, Samsung SDI pled guilty and agreed to pay a \$32 million criminal fine for its role in a global conspiracy to fix prices, reduce output and allocate market shares of color display tubes, a type of cathode ray tube used in computer monitors. The criminal information states that the illegal combination and conspiracy was carried out, in part, in the Northern District of California. Preceding Samsung SDI's guilty plea, Wen Jun ("Tony") Cheng, Chung Cheng "Alex" Yeh, Seung-Kyu "Simon" Lee, Yeong-U g "Albert" Yang and Jae-Sik "J.S." Kim were indicted for their participation in the color display tube conspiracy.	4	7, 8	8	8	8	8	8	8	8	8

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There are two types of CRTs: color display tubes ("CDTs") which are used in computer monitors and other specialized applications; and color picture tubes ("CPTs") which are used in televisions. CDTs and CPTs are collectively referred to herein as "cathode ray tubes" or "CRTs."	13	1	2	2	2	2	2	2	2	2
As used herein "CRT Products" includes (a) CRTs; and (b) products containing CRTs, such as television sets and computer monitors.	14	<i>N/A</i>	2	2	2	2	2	2	2	2
Defendant Samsung Electronics Co., Ltd. ("SEC") is South Korean company with its principal place of business located at Samsung Main Building, 250, 2-ga, Taepyong-ro, Jung-gu, Seoul 100-742, South Korea. During the Relevant Period, SEC manufactured, marketed, sold and/or distributed CRT Products, either directly or indirectly through its subsidiaries or affiliates, to customers throughout the United States.	33	64	51	49	46	45	39	49	46	60

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Defendant Samsung Electronics America, Inc. ("SEAI") is a New York corporation with its principal place of business located at 105 Challenger Road, 6th Floor, Ridgefield Park, New Jersey 07660. SEAI is a wholly-owned and controlled subsidiary of defendant SEC. During the Relevant Period, SEAI manufactured, marketed, sold and/or distributed CRT Products, either directly or indirectly through its subsidiaries or affiliates, to customers throughout the United States. Defendant SEC dominated and controlled the finances, policies, and affairs of SEAI relating to the antitrust violations alleged in this Complaint.	34	65	52	50	47	46	40	50	47	61
Defendant Samsung SDI Co., Ltd. f/k/a Samsung Display Device Co., Ltd. ("Samsung SDI"), is a South Korean company with its principal place of business located at 15 <sup>th</sup> -18 <sup>th</sup> Floor, Samsung Life Insurance Building, 150, 2-ga, Taepyong-ro, Jung-gu, Seoul, 100-716, South Korea. Samsung SDI is a public company. SEC is a major shareholder holding almost 20 percent of the stock. Founded in 1970, Samsung SDI claims to be the world's leading company in the display and energy businesses, with 28,000 employees and facilities in 18 countries. In 2002, Samsung SDI held a 34.3% worldwide market share in the market for CRTs; more than another other producer. Samsung SDI has offices in	35	66	53	51	48	47	N/A	51	48	62

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Chicago and San Diego. During the Relevant Period, Samsung SDI manufactured, marketed, sold and/or distributed CRT Products, either directly or indirectly through its subsidiaries or affiliates, to customers throughout the United States. Defendant SEC dominated and controlled the finances, policies, and affairs of Samsung SDI relating to the antitrust violations alleged in this Complaint. <sup>3</sup>										
Defendants SEC, SEAI, Samsung SDI, Samsung SDI America, Samsung SDI Mexico, Samsung SDI Brazil, Samsung SDI Shenzhen, Samsung SDI Tianjin, and Samsung SDI Malaysia are referred to collectively herein as "Samsung."	42	73	60	58	55	54	41	58	55	69

<sup>3</sup> The analogous paragraphs in the Office Depot complaint does not allege that "SEC dominated and controlled Samsung SDI relating to the antitrust violations alleged in this Complaint."

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Defendant Chunghwa Picture Tubes (Malaysia) Sdn. Bhd. ("Chunghwa Malaysia") is a Malaysian company with its principal place of business located at Lot 1, Subang Hi-Tech Industrial Park, Batu Tiga, 4000 Shah Alam, Selangor Darul Ehsan, Malaysia. Chunghwa Malaysia a wholly-owned and controlled subsidiary of defendant Chunghwa Picture Tubes. Chunghwa Malaysia is a leading worldwide supplier of CRTs. During the Relevant Period, Chunghwa Malaysia manufactured, marketed, sold and/or distributed CRT Products, either directly or indirectly through its subsidiaries or affiliates, to customers throughout the United States. Defendant CPT dominated and controlled the finances, policies, and affairs of Chunghwa Malaysia relating to the antitrust violations alleged in this Complaint.	66	83	70	68	65	64	51	68	65	N/A

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Defendants Chunghwa, Hitachi and Samsung are all members of the Society for Information Display. Defendants Samsung and LG Electronics, Inc. are two of the co-founders of the Korea Display Industry Association. Similarly, Daewoo, LG Electronics, LP Displays, and Samsung are members of the Electronic Display Industrial Research Association. Upon information and belief, Defendants used these trade associations as vehicles for discussing and agreeing upon their pricing for CRT Products. At the meetings of these trade associations, Defendants exchanged proprietary and competitively sensitive information which they used to implement and monitor the conspiracy.	89	111	97	95	93	91	75	95	92	103
Examples of the high degree of cooperation among Defendants in both the CRT Product market and other closely related markets include the following: . . . Defendant Samtel claims to have supplied CRTs to Defendants LG Electronics, Inc., Samsung, Royal Philips, and Panasonic.	93 (k)	114 (xi)	100 (k)	98 (k)	96 (k)	94 (k)	78 (j)	98 (k)	95 (k)	106 (k)

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The CRT conspiracy was effectuated through a combination of group and bilateral meetings. In the formative years of the conspiracy (1995-1996), bilateral discussions were the primary method of communication and took place on an informal, ad hoc basis. During this period, representatives from LG, Samsung and Daewoo visited the other Defendant manufacturers including Philips, Chunghwa, Thai CRT, Hitachi, Toshiba, and Panasonic to discuss increasing prices for CRT Products in general and to specific customers. These meetings took place in Taiwan, South Korea, Thailand, Japan, Malaysia, Indonesia, and Singapore.	106	128	114	112	110	108	92	112	109	120
Samsung, Chunghwa, LG and Daewoo also attended several ad hoc group meetings during this period. The participants at these group meetings also discussed increasing prices for CRT Products.	107	129	115	113	111	109	93	113	110	121



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Each of the participants in these meetings knew, and in fact discussed, the significant impact that the price of CRTs had on the cost of the finished products into which they were placed. Like CRTs themselves, the market for CRT Products was a mature one, and there were slim profit margins. The Defendants therefore concluded that in order to make their CRT price increases stick, they needed to make the increase high enough that their direct customers (CRT TV and monitor makers) would be able to justify a corresponding price increase to their customers. In this way, Defendants ensured that price increases for CRTs were passed on to indirect purchasers of CRT Products.	120	144	130	128	126	124	108	128	125	136
Bilateral discussions were also used to coordinate prices with CRT Product manufacturers that did not ordinarily attend the group meetings, such as Defendants Hitachi, Toshiba, Panasonic, Thai CRT, and Samtel. It was often the case that in the few days following a Top or Management Meeting, the attendees at these group meetings would meet bilaterally with the other Defendant manufacturers for the purpose of communicating whatever CRT Product pricing and/or output agreements had been reached during the meeting.	129	153	139	137	135	133	117	137	134	145

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Between at least 1995 and 2007, Defendant Samsung, through SEC, Samsung SDI, Samsung SDI Malaysia, Samsung SDI Shenzhen, and Samsung SDI Tianjin, participated in at least 200 Glass Meetings at all levels. A substantial number of these meetings were attended by the highest ranking executives from Samsung. Samsung also engaged in bilateral discussions with each of the other Defendants on a regular basis. Through these discussions, Samsung agreed on prices and supply levels for CRT Products.	130	166	152	150	148	146	127	150	147	158
Defendants SEAI, Samsung SDI America, Samsung SDI Brazil, and Samsung SDI Mexico were represented at those meetings and were a party to the agreements entered at them. To the extent SEC and SEAI sold and/or distributed CRT Products, they played a significant role in the conspiracy because Defendants wished to ensure that the prices for CRT Products paid by direct purchasers would not undercut the CRT pricing agreements reached at the Glass Meetings. Thus, SEAI, Samsung SDI America, Samsung SDI Brazil, and Samsung SDI Mexico were active, knowing participants in the alleged conspiracy.	131	167	153	151	149	147	127	151	148	159

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Between at least 1996 and 2001, Defendant Hitachi, through Hitachi, Ltd., Hitachi Displays, Hitachi Shenzhen, and Hitachi Asia, participated in several Glass Meetings. These meetings were attended by high level sales managers from Hitachi. Hitachi also engaged in multiple bilateral discussions with other Defendants, particularly with Samsung. Through these discussions, Hitachi agreed on prices and supply levels for CRT Products. Hitachi never effectively withdrew from this conspiracy.	142	154	140	138	136	134	118	138	135	146

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When Plaintiffs refers to a corporate family or companies by a single name in their allegations of participation in the conspiracy, Plaintiffs are alleging that one or more employees or agents of entities within the corporate family engaged in conspiratorial meetings on behalf of every company in that family. In fact, the individual participants in the conspiratorial meetings and discussions did not always know the corporate affiliation of their counterparts, nor did they distinguish between the entities within a corporate family. The individual participants entered into agreements on behalf of, and reported these meetings and discussions to, their respective corporate families. As a result, the entire corporate family was represented in meetings and discussions by their agents and were parties to the agreements reached in them.	151	175	161	159	157	155	135	159	156	165
A 2004 article from Techtree.com reports that various computer monitor manufacturers, including LG Electronics, Philips, and Samsung, were raising the price of their monitors in response to increases in CRT prices caused by an alleged shortage of glass shells used to manufacture the tubes. Philips is quoted as saying that, "It is expected that by the end of September this year [2004] there will be 20% hike in the price of our CRT monitors."	160	184	167	165	163	161	N/A	168	162	174

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On February 10, 2009, the Antitrust Division of he [sic] United States Department of Justice ("DOJ") issued a press release announcing that a federal grand jury in San Francisco had that same day returned a two-count indictment against the former Chairman and Chief Executive Officer of Defendant Chunghwa Picture Tubes, Ltd., Cheng Yuan Lin, aka C.Y. Lin, for his participation in global conspiracies to fix the prices of two types of CRTs used in computer monitors and televisions. The press release notes that "[t]his is the first charge as a result of the Antitrust Division's ongoing investigation into the cathode ray tubes industry." The press release further notes that Lin had previously been indicted for his participation in a conspiracy to fix the prices of TFT-LCDs. Mr. Lin's indictment states that the combination and conspiracy to fix the prices of CRTs was carried out, in part, in the Northern District of California.	166	191	177	175	173	171	142	178	172	189
The "ongoing investigation" referred to by the DOJ included raids and investigatory demands carried out by DOJ and antitrust authorities in Europe, Japan and South Korea on defendants including MT Picture Display Co., Ltd., the CRT unit of Defendant Panasonic, and Defendant Samsung SDI Co., Ltd.	167	191	177	175	173	171	142	178	172	180, 181, 182

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Preceding Samsung SDI's guilty plea, Wen Jun ("Tony") Cheng, Chung Cheng "Alex" Yeh, Seung-Kyu "Simon" Lee, Yeong-Ug "Albert" Yang and Jae-Sik "J.S." Kim were indicted for their participation in the color display tube conspiracy.	169	194	178, 179, 180	176, 177	173, 174, 175	172, 173, 174	143, 144, 145	178, 179, 180	173, 174, 175	190, 191, 192